UNITED STATES DISTRICT COURT



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BYRON JA	ttes of America v. MAL WATSON))))))	Case No. 19-mj-1	40		
Def	Pendant(s)					
	CRIMINA	L CO	MPLAINT			
I, the complainar	nt in this case, state that the foll	owing is	true to the best of n	ny knowledge and belief.		
On or about the date(s) or	f09/10/2019 and 09/26/2	019	in the parish of _	St. John and Jefferson in the		
Eastern Distric	ct of Louisiana	, the defe	endant(s) violated:			
Code Section			Offense Descrip	otion		
18 U.S.C., Section 2113(119 - St. John Parish			
	((09/26/20	19 - Jefferson Paris	sh)		
This criminal con	nplaint is based on these facts:	,		Fee Process DS/20cusA X Dkid CiRmDep Doc. No.		
Continued on the attached sheet.						
			Steve	omplainant's signature n Quaintance, TFO - FBI Printed name and title		
Sworn to before me and si	igned in my presence.					
Date: September 26, 2	2019		Jam.	Julige's signature		
City and state:	New Orleans, Louisiana			DUGLAS, U.S. MAGISTRATE JUDGE		

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF A.M.ERICA * MAGISTRATE NO. 19-140

* SECTION: DUTY MAG.

BYRON JAMAL WATSON

v.

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Steven E. Quaintance, being duly sworn, do hereby depose and state:

- 1. On Tuesday, September 10, 2019, at approximately 3:06 P.M., the Total Choice Federal Credit Union (TCFCU), located at 100 Palmetto Drive, La Place, Louisiana 70068, was robbed. A black male entered the TCFCU wearing a white long-sleeve shirt, medium to light washed jeans, black shoes, a red belt with "Savage" in white writing, large-framed sunglasses, and black fanny-pack worn across the body. The robber was described as 6'0 to 6'3 in height, slim build, in his early 30's, and wore a brown/auburn dread lock wig with a red headband around his forehead.
- 2. The robber approached the teller counter with a handwritten note stating:
 "ROBBERY. I DON'T WANT TO (HURT) OR (KILL) YOU OR ANYONE IN HERE SO I
 AM GOING TO GIVE YOU (FIVE SECONDS) TO (EMPTY) YOUR (REGISTER)."
 (Parenthesis in original). The teller removed all of the money from the drawer, including the bait bills, and handed it to the robber. The robber fled on foot with over \$7,000 in United
 States currency and headed Northwest on Palmetto Drive.

- 3. During the initial investigation of the bank robbery, a canvas was conducted to locate any surveillance cameras that might be in the area of the bank. In the process of the canvass, a camera was discovered. Approximately one to two minutes subsequent to the robbery, surveillance video from the camera captured an older model white single-cab pickup truck stopped in the area directly behind the bank.
- 4. A search of the Automated License Plate Readers (A.L.P.R.) in the area of the bank was conducted in search of a white single-cab pickup truck. An A.L.P.R. located approximately 1.1 miles from the bank captured an older model white single-cab pickup truck matching the description of the one captured on surveillance cameras behind the bank before the robbery was committed. The license plate on the pickup truck was Louisiana C917378. This vehicle, a white 2001 GMC Sierra, is registered to **BYRON WATSON** (Watson) at 7540 Trapier Avenue, New Orleans, Louisiana.
- 5. A statewide query on the A.L.P.R. system was conducted which revealed the following information: At approximately 10:10 A.M., the GMC Sierra was captured on North Robertson Street in New Orleans. At approximately 12:56 P.M., the GMC Sierra was captured on I-10E at the Laplace exit. At approximately 1:40 P.M., the GMC Sierra was captured in the City of Kenner on Loyola Avenue. At approximately 3:11 P.M., the GMC Sierra was captured on camera approximately 1.1 miles away from the bank. Finally, at approximately 4:45 P.M., the GMC Sierra was captured back in New Orleans at the Orleans Avenue exit on I-10W. An extensive open source search of **WATSON** found he had no ties to the Laplace area.

Investigators with the Saint John the Baptist Parish Sheriff's Office continued to canvass for surveillance in the area. They obtained surveillance footage, from residences of a subdivision immediately adjacent to the bank, which revealed pertinent information regarding

the older model single cab white pick-up truck. At approximately 3:00 P.M. the white truck was first observed as it turned onto Palmetto Drive before it turned right into the subdivision. The truck then made a u-turn and exited the subdivision. A short time later, the same truck repeated this maneuver, as if casing the nearby bank. The truck was then observed as it parked immediately behind the bank, but in a manner that concealed the vehicle from view of bank personnel and bank surveillance cameras. It should be noted that it is from this location that the suspect originated from on bank surveillance, as well as, the same direction the suspect fled toward after the robbery.

The truck was captured on camera moments later as it fled the subdivision, utilizing a rear entrance/exit on Woodland Drive. Surveillance cameras along this rear entrance captured the suspect vehicle as it travelled toward Main Street. The unique vehicle, an older model single cab white pick-up truck with a dent on the driver's side appears to be the same vehicle that was captured on surveillance cameras casing the banks minutes before.

Once the truck reached Main Street and Woodland Drive, the vehicle made a northbound turn onto Main Street where it passed by an A.L.P.R. camera. It was at this point, that the vehicle was captured on camera and investigators obtained the Louisiana license plate of C917378 and identified the vehicle as a 2001 GMC Sierra that was registered to **WATSON**.

- 6. A criminal history request was made for **WATSON** which provided his height of 5'11" and weight 200. Further, the photograph provided by the National Crime Information Center showed similarities in facial composition.
- 7. **WATSON** is currently on Federal Supervised Release for robbing a bank in Mansfield, Texas in 2012. During the bank robbery, in Mansfield, Texas, **WATSON** stated "you have

five seconds to give her the money" which is similar to the words that were written on the note from the bank robbery at Total Choice Federal Credit Union.

- 8. WATSON's probation was moved to New Orleans, Louisiana on or about July 22, 2019. WATSON's Probation and Parole Agent (P&P Agent) advised that WATSON had no purpose for being in Laplace on September 10, 2019. The P&P Agent also provided telephone number (504) 224-3862 for WATSON and an address of 7540 Trapier Avenue, New Orleans, Louisiana.
- 9. On Friday, September 13, 2019, a Special Agent of the F.B.I. authored and obtained a search warrant for the historical cellphone records belonging to **WATSON**. This search warrant was issued by a judge from the Eastern District of Louisiana United States District Court. After the warrant was obtained it was forwarded to Sprint.
- 10. On Monday, September 16, 2019, at approximately 10:30 A.M., an F.B.I. Task Force Officer and Special Agent observed the 2001 GMC Sierra parked at 7550 Trapier Avenue in New Orleans. This is an abandoned and uninhabited residence next to **WATSON's** listed address at 7540 Trapier Avenue. This truck was also confirmed to be the same suspect vehicle observed in the surveillance footage and A.L.P.R. cameras on the day of the robbery.
- 11. Additionally, on Monday, September 16, 2019, Special Agents received the historical cellphone records of **WATSON**, from Sprint, which revealed the following information. The records demonstrate that on September 10, 2019, the cellphone bearing telephone number 504-224-3862, was communicating with towers in New Orleans, LA until approximately 10:50 A.M. The phone began communicating with towers in an area from East Jefferson Parish, LA (in or near Kenner, LA) to west St. John the Baptist Parish (in or near Laplace, LA) by approximately 12:03 P.M. There are no communications to map between

- 10:50 A.M. and 12:03 P.M. Communications with these towers demonstrate the phone moved west to the area in or near Kenner to in or near the Laplace area during that time period. The phone remained in this general vicinity, from the Kenner area to the Laplace area, until after 2:30 P.M. Between approximately 2:14 P.M. and 2:34 P.M., the phone began communicating exclusively with the four towers surrounding the Total Choice Credit Union in Laplace, LA. These towers were situated from 2600 feet to 3.09 miles from the bank. There are no communications which can be mapped from 2:34 P.M. until 3:46 P.M. by which time the phone had returned to the City of New Orleans.
- 12. Based on A.L.P.R. information, Investigators believe that **WATSON** initially arrived in an area near Laplace, at approximately 12:56 P.M., in order to "case" the Total Choice Federal Credit Union. After the business was "cased" **WATSON** relocated to the Iberia Bank branch, in an area near Kenner, at approximately 1:40P.M., in order to "case" a second location. **WATSON** then returned to Laplace, committed the robbery, and fled the area, as captured on the A.L.P.R. camera at 3:11 P.M.
- 13. On Thursday, September 26, 2019, at approximately 3:06 P.M., the Fidelity Bank located at 9099 Jefferson Highway, Jefferson, Louisiana 70123, was robbed. A black male with a trimmed beard entered the Fidelity Bank wearing a white shirt, blue jeans, black sunglasses, and a black baseball cap with a silver brim. The robber was described as light skinned, approximately 20 30 years old, with a slim build.
- 14. The robber approached the teller counter with a handwritten note stating words to the effect "I do not want to hurt anybody, give me all your money, you have 5 seconds." The teller removed all of the money from the drawer, including the bait bills, and handed it to the

robber, along with returning the note to the robbery suspect. The robber fled on foot with approximately \$6,000 in United States currency and headed north on Jefferson Highway.

- 15. Investigators obtained surveillance footage from the interior of the bank, at which, time, investigators observed numerous physical similarities between this suspect and **WATSON**. These similarities included, but are not limited to, similar physical build, similar tattoos on the forearms, and similar facial features.
- 16. During the initial investigation of the bank robbery, a canvass was conducted to locate any surveillance cameras that might be in the area of the bank. In the process of the canvass, a camera was discovered on a residence on Moss Lane, which is the street located north of the bank. Approximately one minute after the robbery, surveillance video from the camera captured an older model white single-cab pickup truck stopped in the area directly behind the bank. This truck was immediately identified by law enforcement as the same vehicle used in the Total Choice Federal Credit Union robbery, which carried the Louisiana license plate number of C917378.
- 17. A statewide query on the A.L.P.R. system was conducted, on the aforementioned plate, which revealed the following information. At approximately 11:38 A.M., the GMC Sierra is captured on North Causeway Boulevard in Jefferson Parish. At approximately 12:45 P.M., approximately 23 minutes after the robbery, the GMC Sierra is captured on Airline Drive, as it exited Jefferson Parish. At approximately 12:55 P.M., the GMC Sierra is captured as it drove through the city of New Orleans. Due to the fact that law enforcement had direct knowledge of **WATSON**, from the previous investigation, it was known that **WATSON**, who is on federal supervised probation, should not be traveling outside the city of New Orleans.

- 18. Investigators made contact with the Probation and Parole Officer of **WATSON** who explained that **WATSON** was scheduled to meet with him on Thursday, September 26, 2019, but never arrived for his meeting.
- 19. Based on the movement and actions of **WATSON** on the day of both robberies, the fact that his vehicle was observed parked behind the bank immediately before the robbery, that the same vehicle was captured as it fled the area after the robbery, that **WATSON** has no connections in the Laplace or River Ridge areas, that he has a prior conviction for bank robbery, that the verbiage used in his first bank robbery, the Total Choice Federal Credit Union robbery, and the Fidelity Bank robbery are similar, that he has similar physical attributes as the suspect of both robberies, and that his Probation and Parole Officer indicated that Watson should not have been in Kenner, Laplace, or River Ridge for any reason, Investigators are respectfully requesting that an arrest warrant be issued for **BYRON WATSON**.

CONCLUSION

Based on the aforementioned factual information, your Affiant respectfully submits that there is probable cause to believe that **BYRON JAMAL WATSON** perpetrated the robbery at Total Choice Federal Credit Union, located at 100 Palmetto Drive in Laplace, Louisiana on September 10, 2019, and the robbery at the Fidelity Bank, located at 9099 Jefferson Highway in River Ridge, Louisiana on September 26, 2019, both in violation of Title 18, United States Code, Section 2113(a). Affiant also prays that the Court will issue an arrest warrant for **BYRON JAMAL WATSON** for said violation. Affiant swears that the above information is true and correct to the best of his knowledge.

Respectfully submitted,

Steven E. Quaintance Task Force Officer

Federal Bureau of Investigation

Subscribed and sworn to before me, this day of September, 2019.

HONORABLE DANA M. DOUGLAS UNITED STATES MAGISTRATE JUDGE

EASTERN DISTRICT OF LOUISIANA



MAG. Number: 19	Complaint/Warrant f	rom Other District
Defendant: By	ron Watson	
Violation:	Bank Robbery 18 usc 2113	· · · · · · · · · · · · · · · · · · ·
U.S. Attorney:	Jon Maestri	
Date Assigned:	9/26/19	
Interpreter Needed?	Yes No	
\$ealed?	Yes	
Court Date and Tim	Q :	
Before Magistrate J	Judge:	· · · · · · · · · · · · · · · · · · ·